



February 26, 2007

One Riverwood Drive
Moncks Corner, SC 29461-2901
(843) 761-8000
P.O. Box 2946101
Moncks Corner, SC 29461-6101

Ms. Amy M. Bennett
Department of Health and Environmental Control
Standards Coordinator,
Bureau of Water,
2600 Bull Street, Columbia, South Carolina 29201

Subject: Proposed Amendment of R.61-68, Water Classifications and Standards,
and R.61-69, Classified Waters, Arsenic Review

Dear Ms. Bennett:

Santee Cooper appreciates the opportunity to comment on the proposal to review and possibly modify the Standard listed above. Santee Cooper, also known as the South Carolina Public Service Authority, is a state owned electric and water utility. We are the source of electric power for approximately two million (2,000,000) South Carolinians either by direct service or through the state's network of cooperatives. We also supply drinking water to one-hundred and twenty-five thousand (125,000) customers in Berkeley and Dorchester counties.

Santee Cooper understands and shares the Department's concern about arsenic in the waters of South Carolina. But we also must take note that it appears the State's current arsenic limits seem to be significantly more restrictive than those of neighboring states and other states in EPA Region IV.

Also, Santee Cooper is aware (as is the Department) that several states regulate arsenic by its organic and inorganic forms. While both forms can be considered arsenic, they appear to have vastly differing biological effects and impacts. As such, there may be merit in regulating the substance as two separate compounds.


Lastly, there would seem to be several "science" related issues concerning work done to formulate the current standard. We recognize that in science there will and should always be debate; this is the very nature of the process. But it strikes us as significant that EPA Region VI uses an arsenic standard 146 times less stringent than the EPA Region IV recommended standard, which has been adopted by South Carolina. As a member of the regulated community, it is our opinion that this is indeed worthy of some reflection.

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In closing, Santee Cooper is pleased to have the opportunity granted by the Department to comment concerning review of the existing Standard. It is our opinion that it is in the best interest of the State of South Carolina and its citizens for the Department to approve and proceed with the review.

If you have any questions, or if we can be of assistance, please do not hesitate to contact Joe Tallon at (843) 761-8000 ext. 4686.

Respectfully Submitted,


Jay Hudson, PE
Manager
Environmental Management

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